Postal Regulatory Commission Submitted 7/28/2014 3:55:24 PM Filing ID: 90088 Accepted 7/28/2014

## UNITED STATES OF AMERICA POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

Periodic Reporting (Proposals Three Through Eight)

Docket No. RM2014-6

# PUBLIC REPRESENTATIVE MOTION FOR ISSUANCE OF INFORMATION REQUEST

(July 28, 2014)

Pursuant to Rules 39 C.F.R. §3001.21(a) and 39 C.F.R. §3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and explanation from the Postal Service concerning the six proposals to change analytical methods for use in the Postal Service's periodic reports. The proposed question seeks information that will allow participants to provide more constructive comments and evaluate whether the proposal meets applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether the proposals meets applicable legal and regulatory requirements, including 39 U.S.C. §3622(c)(10) and 39 C.F.R. part 3010.

#### **Proposal Eight**

 In Proposal 8, the Postal Service requests a change in the methodology for the distribution of USPS Tracking costs. In order to understand this methodology, some issues need to be resolved.

- a. Please confirm that IOCS tallies will be used to calculate the total cost of USPS Tracking for Cost Segments 3 and 6.
- Please confirm that the proposed methodology relies on POS data to distribute all Tracking costs.
- c. Please provide the IOCS tallies and POS data needed to fill in the table below.

# IOCS Tallies for USPS Tracking CS 3 CS 6

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Other Ancillary Services (Delivery Confirmation)	
First-Class Parcels	
Standard Mail Parcels	
Bound Printed Matter Flats	
Bound Printed Matter Parcels	
Media and Library Mail	
First-Class Package Service	
Priority Mail	
Parcel Select Mail	
Total	

### POS USPS Tracking Volumes

CS 3	CS 6

Respectfully Submitted,

/s/ Tracy N. Ferguson
Tracy N. Ferguson
Public Representative for
Docket No. RM2014-6

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